

Regulatory and Governmental Affairs



February 10, 2005

**Verizon Communications**  
Bank of America Tower  
1301 Gervais Street, Suite 825  
Columbia, SC 29201

**VIA HAND DELIVERY**

Mr. Charles L. A. Terreni  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
P.O. Drawer 11649  
Columbia, South Carolina 29211

Phone 803.254.5736  
Fax 803.254.9826

RECEIVED  
FEB 10 PM 4:43  
PUBLIC SERVICE  
COMMISSION

RE: Docket No. 2005-15-C/ Generic Proceeding Established Pursuant to Commission Order No. 2004-466 to Address the Appropriate Rate Classification or Rate Structure for Telephone Lines Located in Elevators and for Telephone Lines Located in Proximity to Swimming Pools

Dear Mr. Terreni:

Enclosed for filing on behalf of Verizon Communications, Inc., please find an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service, the Parties of Record are being served with a copy of the Petition.

Thank you for your assistance in this matter.

Regards,

A handwritten signature in black ink, appearing to read "Stan Bugner".

Stan Bugner  
State Director

Enclosure

cc: Dan Arnett, ORS-Chief of Staff (via U.S. Mail)  
Parties of Record (via U.S. Mail)

INTERVENOR  
#2 4/13/05 10:30

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**ACCEPTED**  
Legal *OK* 2-11-05  
FEB 10 PM 4:42  
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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

**POSTED**  
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IN RE:

**DOCKET 2005-15-C**

Generic Proceeding Established )  
Pursuant to Commission Order No. )  
2004-466 to Address the Appropriate )  
Rate Classification or Rate Structure for )  
Telephone Lines Located in Elevators )  
and For Telephone Lines Located in )  
Proximity to Swimming Pools )

**PETITION TO INTERVENE  
OF VERIZON SOUTH, INC.**

Pursuant to South Carolina Code of Regulations R 103-836A(3), Verizon South Inc. ("Verizon" or "Company") hereby petitions the South Carolina Public Service Commission ("Commission") for permission to intervene in the above-captioned proceeding. In support of its petition, Verizon states as follows:

1. The Company is a corporation and entity existing under the laws of Virginia and has been certified by the Commission to provide, and is currently providing, local exchange, coin, access and intraLATA toll telecommunications services in South Carolina, which are services subject to the jurisdiction of the Commission.
2. For purposes of this proceeding, Verizon's authorized and legal representatives in this matter, to whom all correspondence or communications should be addressed, are:

Mr. Stan Bugner, State Director  
VERIZON COMMUNICATIONS INC.  
1301 Gervais St. - Suite 825  
Columbia, S. C. 29201  
803-254-5736  
803-254-9626 facsimile  
stan.bugner@verizon.com

Steven W. Hamm, Esquire  
C. Jo Anne Wessinger Hill, Esquire  
RICHARDSON, PLOWDEN, CARPENTER &  
ROBINSON, P.A.  
1600 Marion Street  
P.O. Box 7788  
Columbia, South Carolina 29202  
803-771-4400  
803-771-0016 facsimile  
shamm@rperl.com

RETURN DATE: *OK DBD*  
SERVICE: *OK DBD*

3. On or about October 5, 2004, the Commission issued Order No. 2004-466, wherein the Commission held that a generic proceeding should be established to address the appropriate rate classification or rate structure for telephone lines located in elevators and for telephone lines located in proximity to swimming pools.

4. On or about January 25, 2005, the Commission issued a Notice of Proceeding, so that the Commission may receive relevant information related to the potential impact of reclassification of these types of telephone lines, i.e. those telephone lines required by regulation or code for safety or emergency use, such as telephone lines required to be located in elevators or in proximity to swimming pools.

5. Because Verizon has a significant number of multi-story buildings, condominiums, apartments, duplexes and other similar dwelling units in its service area, any decision of the Commission in this docket will have a direct impact on the Company. Therefore, Verizon has a direct and substantial interest in this docket and respectfully requests permission to intervene in this matter as a full party of record.

6. Verizon wishes to assist the Commission in the development of a full and fair record, which will assist the Commission competently to resolve the issues in this proceeding. Verizon's position in this matter will be more fully detailed at the hearing and/or after completion of any discovery.

7. Verizon is informed and believes that its request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record to address the concerns and views of Verizon.

Accordingly, Verizon respectfully requests that the Commission, (1) grant this request and issue an order permitting Verizon to participate in this proceeding as a full party of record; (2) allow Verizon to participate fully in the this proceeding and to take such positions as it deems advisable; and (3) grant any other and further relief as is just and proper.

Respectfully submitted this the 9th day of February, 2005.

VERIZON SOUTH INC.

BY: 

Richard Chapkis  
Verizon South Inc.  
One Tampa City Center  
201 N. Franklin Street  
FLTC0007  
Tampa, Florida 33601  
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Its Attorneys

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

RECEIVED  
2005 FEB 10 PM 4:43  
SC PUBLIC SERVICE  
COMMISSION

IN RE:

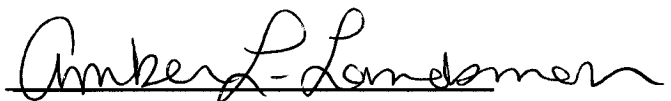
**Docket No. 2005-15-C/** Generic Proceeding Established )  
Pursuant to Commission Order No. 2004-466 to Address )  
the Appropriate Rate Classification or Rate Structure for ) **CERTIFICATE OF SERVICE**  
Telephone Lines Located in Elevators and for )  
Telephone Lines Located in Proximity to Swimming Pools )

This is to certify that I, Amber L. Landsman, have caused to be served this day, one (1) copy of the Petition to Intervene by Verizon Communications, Inc., in the above referenced docket by placing a copy of same in the care and custody of the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as follows:

Mr. Curly P. Huggins  
P.O. Box 1820  
3480 Highway 701 N.  
Conway, S.C. 29528-1820

Ms. Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, S.C. 29211

Mr. Rufus Watson  
4700 Touhey Drive, Unit 107  
Myrtle Beach , South Carolina 29579



AMBER L. LANDSMAN

February 10, 2005  
Columbia, South Carolina